

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re: JEFFREY WINICK

Chapter 7
Case No. 20-11976 (SHL)

Debtor.

-----X
UNITED STATES OF AMERICA

Plaintiff,

-against-

Adversary No. 21-1138 (SHL)

JEFFREY WINICK

Defendant.

-----X

DISCOVERY PLAN

The parties to the above-captioned adversary proceeding agree and stipulate to the following discovery plan:

1. Initial disclosures pursuant to Federal Rule of Bankruptcy Procedure 7026 shall be served no later than **August 20, 2021**.

2. Any motion to amend pleadings or to join additional parties shall be filed no later than **September 3, 2021**.

3. The parties shall conduct discovery in accordance with the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Local Rules of the Bankruptcy Court for the Southern District of New York, subject to the following schedule:

a. Initial interrogatories and documents requests shall be served by **September 10, 2021**.

b. All requests for admission shall be served by **January 28, 2022**.

- c. Unless extended by the Court for cause shown, all non-expert fact discovery, including responses to requests for admission and depositions of fact witnesses, shall be completed by **September 19, 2022**.
 - d. Initial expert reports shall be served by **October 20, 2022**.
 - e. Rebuttal expert reports shall be served by **November 18, 2022**.
 - f. Expert depositions shall be taken by **December 16, 2022**.
 - g. Unless extended by the Court for cause shown, all expert discovery shall be completed by **December 30, 2022**.
4. Any deposition may be conducted by video conference or other means agreeable to the parties and reasonable under the circumstances to ensure the health and safety of all persons attending the deposition.
5. The parties shall appear at a discovery status conference on **August 16, 2022 at 10:00 A.M.**

5. Except for the deadline contained in Paragraph 3(c) and (g) above, the parties may modify the deadlines set forth herein by mutual agreement or upon request and further order from the Court. The parties agree to act in good faith in discussing any extension to any such deadline. The deadline set forth in Paragraph 3(c) and (g) can be modified only upon request and further order from the Court.

Dated: July 13, 2022
New York, New York

DAMIAN WILLIAMS
United States Attorney
Attorney for the United States

By: /s/ Zachary Bannon
ZACHARY BANNON
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Tel.: (212) 637-2728
E-mail: Zachary.Bannon@usdoj.gov

Dated: July 15, 2022

Dated: July 13, 2022
New York, New York

STEVEN WILAMOWSKY
Attorney for Jeffrey Winick

By: /s/ Steven Wilamowsky
STEVEN WILAMOWSKY
Schiff Hardin LLP
1185 Avenue of the Americas, Ste. 3000
New York, New York 10036
Tel.: (212) 753-5000
E-mail: swilamowsky@schiffhardin.com

/s/ Sean H. Lane
United States Bankruptcy Judge